

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTH DISTRICT OF ILLINOIS  
EASTERN DIVISION

ERIC VON SCHAUMBURG,	)	
	)	
Plaintiff,	)	Case No. 1:18-cv-03427
	)	
v.	)	District Judge John Z. Lee
	)	
HEALTH CARE SERVICE CORPORATION	)	Magistrate Judge Sidney I. Schenkier
d/b/a	)	
BLUE CROSS BLUE SHIELD OF ILLINOIS,	)	
	)	
Defendant.	)	

**MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL**  
**AND TO FILE REDACTED BRIEF**

Plaintiff, Eric von Schaumburg, through counsel, hereby moves for leave to file documents under seal pursuant to Fed. R. Civ. P. 5.2(d) and Local Rule 26.2 and to file a redacted brief, and states as follows:

1. Plaintiff has contemporaneously filed Plaintiff's Proposed Findings of Fact and Conclusions of Law.
2. In support of his Proposed Findings of Fact and Conclusions of Law, Plaintiff seeks to attach nine exhibits, labeled as Exhibits 2, 6, 7, 17, 18, 24, 26, 27, and 28, which include documents that were produced by Defendant and labeled as "Confidential" pursuant to an Agreed Confidentiality Order. (Docket No. 38).
3. Plaintiff moves for leave, pursuant to Local Rule 26.2 to file Exhibits 2, 6, 7, 17, 18, 24, 26, 27, and 28 under seal.
4. Additionally, Plaintiff seeks leave to file a redacted version of his Proposed Findings of Fact and Conclusions of Law, as it contains compensation information for non-parties that is also subject to the Agreed Confidentiality Order.

5. Pursuant to Local Rule 26.2(c), unredacted copies of Exhibits 2, 6, 7, 17, 18, 24, 26, 27, and 28, and an unredacted version of Plaintiff's Proposed Findings of Fact and Conclusions of Law, will be provisionally filed, contemporaneously with this Motion for Leave to File Documents Under Seal.

**WHEREFORE**, for the foregoing reasons, Plaintiff, Eric von Schaumburg, respectfully requests that this Honorable Court order that Exhibits 2, 6, 7, 17, 18, 24, 26, 27, and 28 to Plaintiff's Proposed Findings of Fact and Conclusions of Law can be filed under seal.

Dated: January 29, 2021

Respectfully submitted,

/s/ Martina B. Sherman  
Attorney for Plaintiff  
Eric von Schaumburg

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 29, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to all attorneys of record.

/s/ Martina B. Sherman  
Attorney for Plaintiff  
Eric von Schaumburg

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